# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
JOANN INC., <sup>1</sup>	)	Case No. 25-10068 (CTG)
	)	,
Post-Effective Date Debtor.	)	
	)	

## CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER SCHEDULING OMNIBUS HEARING DATE

The undersigned counsel to Ann Aber, in her capacity as Plan Administrator in the above-captioned cases (the "Plan Administrator"), hereby certifies the following:

- 1. Counsel for the Plan Administrator, through communication with the Chambers of The Honorable Craig T. Goldblatt, received an omnibus hearing date.
- 2. Attached hereto as **Exhibit A** is a proposed Order Scheduling Omnibus Hearing Date (the "<u>Proposed Order</u>") that states with specificity the date and time of the omnibus hearing scheduled, subject to Court approval.
- 3. The Plan Administrator respectfully requests that the Proposed Order be entered at the earliest convenience of the Court.

[Remainder of Page Intentionally Left Blank]

The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number, is JOANN Inc. (5540). The Post-Effective Date Debtor's mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Dated: December 17, 2025 Wilmington, Delaware

### /s/ Michael E. Fitzpatrick

### COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451) Stacy L. Newman (No. 5044) Jack M. Dougherty (No. 6784) Michael E. Fitzpatrick (No. 6797) 500 Delaware Avenue, Suite 600 Wilmington, Delaware 19801

Telephone: (302) 652-3131 Facsimile: (302) 652-3117

Email: preilley@coleschotz.com

> snewman@coleschotz.com jdougherty@coleschotz.com mfitzpatrick@coleschotz.com

- and -

#### HAHN LOESER & PARKS LLP

Christopher B. Wick (admitted *pro hac vice*) Philip K. Stovall (admitted *pro hac vice*) 200 Public Square, Suite 2800

Cleveland, Ohio 44114

Telephone: (216) 274-2489 Facsimile: (216) 241-2824 Email: cwick@hahnlaw.com

pstovall@hahnlaw.com

Co-Counsel to the Plan Administrator